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June 23, 2025

**Via ECF**

Honorable Taryn A. Merkyl  
United States Magistrate Judge  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: *Korey Watson v. City of New York, et al.*,  
23-CV-08975 (LDH) (TAM)

Your Honor:

I am a Senior Counsel in the Office of Muriel Goode-Trufant, Corporation Counsel of the City of New York, representing defendants the City of New York, Sabrina Dunca, and Kern Proberbs (hereinafter “City Defendants”) in the above referenced matter. City Defendants respectfully request that Your Honor grant them a two week extension from today, June 23, 2025 to July 7, 2025 to submit their pre-motion conference letter and materials in accordance with the Individual Rules and Practices of the Honorable LaShann DeArcy Hall. *See* Civil Docket Entry dated June 9, 2025. All counsel consent to this request<sup>1</sup>.

By way of background, plaintiff alleges that, on September 7, 2022, he appeared at the Human Resources Administration office, as instructed, at 275 Bergen St., to resolve issues with his benefits when he was stabbed with a boxcutter by another individual in line for services. *See* ECF No. 1. Plaintiff alleges, *inter alia*, that defendants City of New York, FJC security, and John and Jane Doe FJC Security officers violated both his state and federal constitutional rights, and brings additional state law claims including a claim for negligent hiring and training. *Id.* On May 29, 2024 Plaintiff filed an amended complaint adding seven John Doe defendants<sup>2</sup> as parties in this action. *See* Civil Docket Entry No. 18.

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<sup>1</sup> Co-defendants FJC security, Ashley Johnson, Natasia Lyles, Tamika Jenkins, Patricia Robinson, and Sean Williams are represented by Joseph Wodarski, Esq. Plaintiff is represented by Gideon Oliver, Esq, Elena Louisa Cohen, Esq. and Remy Green, Esq.

<sup>2</sup> The individually named defendants are Sabrina Dunca, Ashley Johnson, Kern Proberbs, Natasia Lyles, Tamika Jenkins, Patricia Robinson, and Sean Williams. *See* Civil Docket Entry No. 18.

A settlement conference was scheduled for May 30, 2025 and, in preparation for that conference, defendant City discovered that plaintiff previously executed a General Release in another matter against the City on or about August 14, 2024 which, in our view, bars this action. On June 9, 2025, the Court extended the deadline for City Defendants to submit a pre-motion conference letter in accordance with the Individual Rules and Practices of the Honorable LaShann DeArcy Hall to today, June 23, 2025. *See* Civil Docket Entry dated June 9, 2025.

Since the extension was granted, the plaintiff and City Defendants were able to engage in a meet and confer with one another on June 18, 2025 where the parties discussed whether motion practice was, indeed, required. It has become clear that, unfortunately, motion practice will be needed to resolve the issue of the General Release and additional time is needed for City Defendants to finalize and submit their pre-motion conference request and materials in accordance with the Individual Rules and Practices of LaShann DeArcy Hall.

Accordingly, and with the consent of all parties, City Defendants respectfully request that the Court grant the parties an additional two weeks to file their pre-motion conference letter and materials in compliance with the Hon. D'Arcy Hall's Individual Rules of Practice. Thank you for your consideration herein.

Respectfully submitted,

*KellyAnne Holohan /s/*

KellyAnne Holohan  
Senior Counsel

cc: **Via ECF**  
*All counsel of record*